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UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re Chapter 11  
LEHMAN BROTHERS HOLDINGS INC., *et al.*, Case No. 08-13555 (SCC)  
Debtors. Jointly Administered

-----x  
**CLAIMS LITIGATION SCHEDULE WITH RESPECT TO CLAIM NO. 67707 FILED  
BY SPANISH BROADCASTING SYSTEM, INC. AND THE OBJECTION  
INTERPOSED BY LEHMAN BROTHERS HOLDINGS INC.**

This Claims Litigation Schedule has been submitted in accordance with the Order Pursuant to Section 105 of the Bankruptcy Code, Bankruptcy Rule 9014, and General Order M-390 Authorizing the Debtors to Implement Claims Hearing Procedures and Alternative Dispute Resolution Procedures for Claims Against Debtors, entered April 19, 2010 [Dkt. No. 8474], with

respect to Proof of Claim no. 67707 filed by Spanish Broadcasting System, Inc. and the objection interposed by Lehman Brothers Holdings Inc., as Plan Administrator, regarding such proof of claim, and is hereby adopted by this Court as the Claims Litigation Schedule for Proof of Claim no. 67707.

1. All fact discovery shall be completed by February 23, 2015.
2. The parties are to conduct discovery in accordance with the Federal Rules of Bankruptcy Procedure, the Federal Rules of Civil Procedure (as incorporated therein), and the Local Rules of this Court. In accordance with Federal Rules of Bankruptcy Procedure 9014 and 7026, Federal Rule of Civil Procedure 26(a)(2) shall apply to this contested matter. The following interim deadlines may be extended by the written consent of the parties without application to the Court, provided all fact discovery is completed by the date set forth in paragraph 1 above:
  - A. Requests for production of documents may be served no later than October 27, 2014.
  - B. Objections and responses to requests for the production of documents shall be served within 30 days of the service of each request or set of requests for the production of documents.
  - C. The parties may each serve a total of 25 interrogatories pursuant to the following schedule:
    - (i) Interrogatories pursuant to Local Bankruptcy Rule 7033-1(a) and 7033-1(b) may be served no later than November 3, 2014; and
    - (ii) Interrogatories pursuant to Local Bankruptcy Rule 7033-1(c) may be served no later than January 30, 2015.

D. Objections and responses to interrogatories shall be served within 30 days of the service of each interrogatory or set of interrogatories.

E. The parties may each serve a total of 25 requests for admission no later than January 30, 2015.

F. Objections and responses to requests for admission shall be served within 30 days of the service of each request for admission or set of requests for admission.

G. Document production shall be conducted on a rolling basis to be completed by December 22, 2014.

H. Privilege logs must be served no later than January 8, 2015.

I. Depositions of fact witnesses to be completed by February 23, 2015.

3. Other than in response to reasonably limited, targeted search requests agreed to by the parties or ordered by this Court, the parties shall not be required to produce, or identify on any log, documents from the following categories of privileged documents:

A. Hard copy and electronic files of in-house counsel and outside counsel;

B. Documents and communications solely between in-house counsel and outside counsel;

C. Internal documents and communications solely within an outside counsel law firm; and

D. Documents and communications solely between or among outside counsel law firms for a single client.

4. Expert reports will be exchanged on March 23, 2015.

5. The parties will exchange any rebuttal expert reports on April 24, 2015.

6. Expert discovery to be completed 21 days after the receipt of the last expert report.

7. Within 10 days after the completion of discovery, the parties shall attempt to jointly recommend to the Court proposed procedures for resolving this contested matter, including, but not limited to, dates for dispositive motions and a merits hearing.

8. For discovery purposes, delivery by email shall constitute proper service.

9. The deadlines set forth in this Order may be modified by agreement of the parties or by the Court.

Dated: New York, New York  
October 7, 2014

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*Attorneys for Lehman Brothers Holdings  
Inc. and Certain of Its Affiliates*

**SO ORDERED:**

Dated: New York, New York  
October 14, 2014

/s/ Shelley C. Chapman  
Honorable Shelley C. Chapman  
United States Bankruptcy Judge